

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**JOINT MOTION TO DISMISS WITHOUT PREJUDICE**

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss without prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41(a)(2). No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Seth S. Webb  
Seth S. Webb  
Brown & Crouppen  
211 North Broadway  
Suite 1600  
St. Louis, MO 63102  
(314) 421-0216  
sethw@getbc.com  
*Counsel for Plaintiffs*

/s/ William M. Gage  
William M. Gage (MS Bar #8691)  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4561  
william.gage@butlersnow.com

/s/ Susan M. Robinson  
Susan M. Robinson (W. Va. Bar #5169)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 24338

(304) 414-1800  
srobinson@tcspllc.com  
*Counsel for the Ethicon Defendants*

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

**EXHIBIT A**

<b>Civil Action No.</b>	<b>Case Style</b>
2:13-cv-10089	Carol Brockman v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-10092	Janette Commean v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-10093	Tracy Deaton v. Ethicon, Inc.; Johnson & Johnson
2:13-cv-10142	Mary Harper v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-10944	Della Welch and Thomas Welch v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-12572	Tammy R. Monte and Doug Monte v. Ethicon, Inc.; Johnson & Johnson
2:13-cv-14379	Teresa Medley and Gary L. Medley v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-19125	Tanya Franklin and Charles Franklin v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:14-cv-23713	Donna Stephens and Anthony Stephens v. Ethicon, Inc.; Johnson & Johnson
2:14-cv-23716	Pamela Alyce Young and Robert Young v. Ethicon, Inc.; Johnson & Johnson
2:14-cv-23746	Tonya Schwartz and Darin Schwartz v. Ethicon, Inc.; Johnson & Johnson
2:14-cv-26138	Rose Birch v. Ethicon, Inc.; Johnson & Johnson
2:14-cv-26141	Tara Lynn Ollis and Darin Ollis v. Ethicon, Inc.; Johnson & Johnson
2:14-cv-29835	Jacqueline E. Jones and Robert R. Jones v. Ethicon, Inc.; Johnson & Johnson
2:15-cv-11151	Sharon Alexander v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-00379	Stephanie Earnheart and Charles Earnheart v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-04648	Rhonda Bailey v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-04850	Karen LeeMan-Moon and Eric Moon v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-06111	Murl D. Winfield v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-06631	Ellen L. Ware v. Ethicon, Inc.; Johnson & Johnson